

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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February 29, 2016

Ref: 8EPR-N

Bridget Mandel, Acting Division Administrator  
Federal Highway Administration  
2520 West 4700 South, Suite 9A  
Salt Lake City, UT 84118

Mr. Carlos Braceras, Executive Director  
Utah Department of Transportation  
4501 South 2700 West  
P.O. Box 141265  
Salt Lake City, Utah 84114-1265

Re: Final Environmental Impact Statement, 1800  
North Project: Council on Environmental Quality  
# 20160010

Dear Ms. Mandel and Mr. Braceras:

In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency Region 8 has reviewed the 1800 North Final Environmental Impact Statement (Final EIS) prepared by the U.S. Federal Highway Administration (FHWA) and the Utah Department of Transportation (UDOT). It is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project.

### **Project Description**

The FHWA and UDOT propose transportation improvements on 1800 North (SR-37) between 2000 West and Interstate 15 (I-15). The study area is located in Davis and Weber counties, within the cities of Clinton, Sunset, Roy and Clearfield. The 1800 North study corridor is a two-lane roadway with a two-way left turn lane between 100 West and 200 West. At approximately 500 West the Union Pacific Railroad freight mainline crosses 1800 North with two tracks and the Utah Transit Authority passenger mainline (FrontRunner) crosses 1800 North with a single track. The purpose of the project is to implement transportation improvements on the 1800 North study corridor that would address current operational and safety conditions and future 2040 traffic needs by reducing congestion, improving mobility and adding access to I-15, and improving safety and operational characteristics of the study corridor. Planning for the project began as part of the Wasatch Front Regional Council's (WFRC) regional planning efforts, and planned improvements are a part of the WFRC's overall plan to address



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congestion in the study area.

The project evaluated a wide range of alternatives including the no-action alternative, a transportation system management alternative, a transit alternative, and numerous build alternatives. FHWA and UDOT have identified 1800 North Alternative F as the Preferred Alternative. Elements of the Preferred Alternative include widening at 1800 North, grade-separation at the Union Pacific/FrontRunner Railroad crossing, and a new interchange on I-15 at 1800 North.

## **The EPA's Comments and Recommendations**

The EPA appreciates your consideration of our scoping comments in our letter dated December 15, 2010 and our comments on the Draft EIS in our letter dated December 8, 2014. Our comments on the Final EIS focus on air quality, greenhouse gas (GHG) emissions and climate change, and are outlined below.

### *1. Air Quality Analysis*

Throughout the NEPA process for this project we have recommended that the EIS contain project emission inventory data for the relevant criteria pollutant and for mobile source air toxics (MSATs). The FHWA has responded that considering the smaller magnitude of this project and the fact that the traffic volumes indicated are well below the threshold of the agency's MSAT guidance, the FHWA does not feel that such an effort is necessary. We continue to recommend that for future similar projects, emission inventory data for relevant criteria pollutants and for MSATs be disclosed in the EIS. Disclosure of this information provides both the public and federal decision maker with quantitative, documented information regarding the current emissions burden and projected 2040 emissions for all alternatives.

The EPA's comments on the Draft EIS requested addition of a technical report to Appendix A in the Final EIS that fully describes the methodology, data inputs and intersection information that went into the carbon monoxide hot-spot modeling analysis for intersections. Although the FHWA's response to that recommendation identified that a technical memorandum had been added to the Appendix, we were unable to locate it the document.

### *2. Greenhouse Gas Emissions and Climate Change*

The Final EIS quantifies project greenhouse gas emission estimates relative to state and global total estimates. For future reference, EPA does not recommend comparing GHG emissions from a proposed action to statewide or global emissions because such comparisons do not reveal anything beyond the nature of climate change itself, i.e., the fact that diverse individual sources of emissions each make relatively small additions to global atmospheric GHG concentrations that collectively have a huge impact. This approach does not provide meaningful information for a project level analysis. The environmental impacts are best described by using emissions as a proxy when comparing the project, including alternatives and potential mitigation. Additionally, the Final EIS states that FHWA has concluded that GHG emissions from the project build alternatives will be insignificant and will not play a meaningful role in the selection of a preferred alternative (p. 3-62). We disagree that the emissions will not play a meaningful role in the selection of the alternative and recommend estimating GHG emissions associated with all alternatives. These emission levels can serve as a basis for

comparison of the alternatives with respect to GHG impacts.

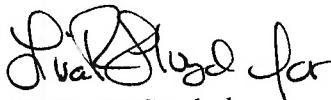
The Final EIS does not consider potential changes to the affected environment that may occur due to climate change. We recommend that future NEPA documents describe potential changes to the Affected Environment that may result from climate change. Including future climate scenarios would help decision makers and the public consider whether the environmental impacts of the alternatives would be exacerbated by climate change. If impacts may be exacerbated by climate change, additional mitigation measures may be warranted.

In addition we recommend that future NEPA documents consider climate adaptation measures based on how future climate scenarios may impact the project. The National Climate Assessment (NCA), released by the U.S. Global Change Resource Program <sup>[1]</sup>, contains scenarios for regions and sectors, including energy and transportation. Using NCA or other peer reviewed climate scenarios to inform alternatives analysis and possible changes to the proposal can improve resilience and preparedness for climate change.

### Closing

We appreciate the opportunity to comment on this Final EIS. We would be happy to discuss these comments further. If you have any questions, please feel free to contact David Fronczak of my staff at 303-312-6096 or me at 303-312-6704.

Sincerely,



Philip S. Strobel  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

cc: Brett Slater, UDOT  
Paul Ziman, FHWA

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<sup>[1]</sup> <http://nca2014.globalchange.gov/>